Supreme Court, U.S.
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No. 04-967

In The

Supreme Court of the United States

NORMA McCORVEY, FORMERLY KNOWN AS JANE ROE,

Petitioner,

v.

BILL HILL, DALLAS COUNTY DISTRICT ATTORNEY,

Respondent.

On Petition For Writ Of Certiorari To The United States Court Of Appeals For The Fifth Circuit

BRIEF FOR OIL OF JOY FOR MOURNING, INC., A TEXAS NON-PROFIT CORPORATION, AS AMICUS CURIAE SUPPORTING PETITIONER

DONNA SMITH CUDE
Counsel of Record
20333 State Hwy. 249, Suite 200
Houston, Texas 77070
(281) 370-0064

COCKLE LAW BRIEF PRINTING CO (800) 225-6964
OR CALL COLLECT (402) 342-2831

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INTEREST OF AMICUS CURIAE[1]

Oil of Joy for Mourning, Inc., a Texas non-profit corporation (hereinafter "Oil of Joy") is a faith-based abortion recovery group. As part of its ministry, Oil of Joy offers a rehabilitation program for post-abortive women to random segments of the prison population in Texas who have been harmed by abortion. In connection with this recovery program, Oil of Joy sought and obtained data from women in prison who had completed that rehabilitation program. The responses obtained in this study, showing a connection between abortion and dysfunctional behavior, including subsequent crime and incarceration, are important for this Court to consider in making its ruling on the issues raised by Petitioner, McCorvey in the above-entitled case before the Court.

SUMMARY OF ARGUMENT

"Instead of a Right to Choose, abortion has become a woman's Right to Lose."[2]

The United States Supreme Court ruling in *Roe v. Wade,* 410 U.S. 113 (1973), authorizing abortion on demand has had devastating effects on many women who have had such abortions, not to mention catastrophic

[1] Letters of consent to the filing of this brief are submitted to the Court with this brief. No counsel for either party to this matter authored this brief in whole or in part. Furthermore, no persons or entities, other than the amicus itself, made a monetary contribution to the preparation or submission of this brief.

[2] Reardon, David C., M.D., *A Path to Hope,* THE POST-ABORTION REVIEW VOL. 7. NO. 2, at 4 (April-June 1999) (quote of Carol Crossed).

consequences to society at large.[3] These untoward consequences of *Roe* are confirmed and demonstrated in the findings of Oil of Joy's survey of women in prison, in which a significant percentage of those responding reported the following problems as a result of their having one or more abortions: depression, suicidal ideation and suicide attempts, alcohol and drug abuse, child abuse and neglect, sexual dysfunction, chronic marriage and intimate relationship problems, and an increased likelihood of turning to crime and subsequent incarceration.[4] The Court should consider these effects, and Oil of Joy requests that the Court take into consideration the social science data it has identified, and grant Plaintiff-Appellant Norma McCorvey's petition for a writ of certiorari.

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[3] Besides the loss of progeny, which dwarfs the recent tsunami deaths by comparison, abortion on demand has contributed to the social problems of suicide, crime and incarceration. *See infra* at ¶ I.A.5. In addition, some assert that without the commonality of abortion during the past three decades, there would be no Social Security crisis as there would be millions more living between the ages of 18 and 31 who would be contributing to the fund.

[4] Those findings are consistent with the results of numerous studies done by researchers reflected in voluminous published works, including David C. Reardon, M.D., *A List of Major Psychological Sequelae of Abortion* (1997) *at* http://www.afterabortion.org [hereinafter *Psychological Sequelae*]; Strahan, Thomas W., *Detrimental Effects of Abortion, An Annotated Bibliography* (3d ed. 2001 & Supp. I 2002 & Supp. II 2003); Philip G. Ney, M.D., *The Effects of Abortion on Health and Demography in North America* (2002) *at* http://www.messengers2.com [hereinafter *Effects of Abortion*].

ARGUMENT

I. THIS COURT SHOULD CONSIDER THE EFFECTS OF ABORTION ON THE HEALTH OF WOMEN AND ON SOCIETY

A. INTRODUCTION

Since the landmark decision in *Roe v. Wade*, the psychological health of a woman throughout her pregnancy has been a consideration of paramount importance to this Court.[5] However, in all its jurisprudence on this subject, the Court has wholly failed to consider the adverse effects to a pregnant woman of permitting unfettered access to abortion. Over the 32-year period since abortion was legalized by this Court, there have been dramatic and devastating effects to women, as well as damaging effects to society. Much evidence has been presented to the Court by Petitioner. In addition, the many harmful effects of abortion on demand have been shown through a recent study of women in prison which Amicus Curiae, Oil of Joy, requests the Court consider.[6]

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[5] *See, e.g., Roe v. Wade,* 410 U.S. 113, 153, 163 (1973) (citing potential adverse psychological consequences of maternity); and *Planned Parenthood of Southeastern Pa. v. Casey,* 505 U.S. 833, 846 (1992) (wherein the Court stated that the state has legitimate interests throughout the pregnancy in protecting the health of the woman).

[6] The description and results of the surveys are described in the Affidavit of Rhonda Arias, Director of Oil of Joy, which is appended hereto within the Appendix. Hereinafter, references to the Affidavit will be to "App. __, ¶ __."

B. OIL OF JOY STUDY REVEALS ADVERSE EFFECTS OF ABORTION ON WOMEN IN PRISON

In 2004, Oil of Joy offered a rehabilitation program to a group from the general offender population in three prisons in Texas, the Lane Murray Unit and the Mt. View Unit, both located in Gatesville Texas, and the Plane State Jail, in Dayton. (App. 1, ¶¶ 2, 3). Oil of Joy conducted intake and exit surveys in conjunction with this program. The results of this study are based on surveys of 104 female offenders in Texas prisons who voluntarily completed a 10-week support group for women hurt by abortion (App. 1, ¶ 4). All of the participants reported a range of psychological sequelae from regret to actual suicide attempts. Despite their present state of incarceration, approximately 59 percent stated that they view their lives as before and after their abortion. (App. 1, ¶ 7). In short, abortion was the defining moment of their lives.

1. Abortion was a Precursor to Suicide Attempts and Suicidal Ideation

Due to unresolved grief over the abortion, 69 out of 104, or approximately 66 percent, of the women reported depression following their abortions. (App. 1, ¶ 7). The reasons given for their depression included lowered self-esteem post-abortion, repressed grief due to returning to environments where abortion was considered normal, or having been forced or coerced strongly by a spouse or family member. (App. 1, ¶ 7). In addition, suicidal ideation and actual suicide attempts were relatively common among these post-abortive women. Approximately 32 percent of the women in the study, 33 out of 104, reported having attempted suicide following their abortions, with

38 out of 104, or 37 percent, experiencing repeated thoughts of suicide.

These results are consistent with other studies done regarding the relationship between suicide and abortion. Researchers in Finland found the suicide rate among post-abortive women to be approximately six times higher than women who delivered, and three times higher than that of women in the general population.[7] Likewise, scientists in Britain found a significantly higher suicide attempt rate after induced abortion as compared to the suicide attempt rate before abortion. The researchers stated that their data suggested "a deterioration in mental health may be a consequential side effect of induced abortion."[8]

2. Abortion was a Major Stressor Leading to Drug and Alcohol Abuse

Abortion is significantly linked to offenders' subsequent drug abuse. Female offenders in the Oil of Joy study specifically attributed their drug or alcohol abuse to stress related to the abortion. Most reported that their abortion was either a starting point, or a landmark of increased usage.[9] Specifically, 81 out of 104 reported post-abortion

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[7] *Effects of Abortion, supra* note 4, at ¶ B.1.b. (citing M. Gissler, E. Hemminke and J. Lonnqvist, *Suicides after Pregnancy in Finland, 1987-94: Register Linkage Study,* 313 BRIT. MED. J. 1431-34 (1996)).

[8] C.M. Morgan, M. Evans, J. Peter and C. Currie, *Mental Health May Deteriorate as a Direct Effect of Induced Abortion,* 314 BRIT. MED. J. 902 (1997).

[9] This is consistent with another study in which it was found that post-abortion stress aggravated substance abuse problems among women with a prior history of substance abuse. *See* Reardon, David C., *New Study Confirms Link between Abortion and Substance Abuse,* THE POST-ABORTION REVIEW VOL. 1. NO. 3, at 2 (Fall 1993).

drug abuse, and 74 out of 104 reported post-abortion alcohol abuse. Only 14 percent said they had no substance abuse post-abortion. Lowered self-esteem, the pain of a loss that no one seems to understand, nowhere in society to grieve, feelings of guilt and shame, and anger toward themselves and others, are some of the reasons women gave for "medicating" their pain through drug or alcohol abuse. (App. 1, ¶ 8). These findings are similar to those results reached in a separate study done by the Elliot Institute researchers, who found that of the women surveyed, those who aborted their first pregnancy were 3.9 times more likely to engage in subsequent drug or alcohol abuse than those who have never had an abortion.[10]

In the 1980's, in each of three separate studies done by different researchers on post-abortive women, virtually all of the participants expressed feelings of deep anger, resentment and hostility toward themselves, their partner and the medical professionals involved. The hostility was identified as being the result of feeling coerced by boyfriends, parents or physicians and feeling that they did not have a choice.[11] It is well-known that the presence of hostility, combined with alcohol or drug abuse, reduces inhibitions or self-control and increases the tendency toward violence and other antisocial behavior, which may ultimately lead to incarceration.[12] Thus, induced abortion

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[10] *Id.* at p. 1.

[11] Strahan, Thomas W., *The Incidence and Effects of Alcohol and Drug Abuse in Women Following Induced Abortion*, LIFEISSUES.NET: CLEAR THINKING ABOUT CRUCIAL ISSUES VOL. 3, NO. 2 (A.I.R.V.S.C. 1990).

[12] In another study, induced abortion followed by alcohol abuse was linked to being charged with driving while intoxicated, automobile accidents, divorce or separation, and job loss. Morrissey, E.R. and Schuckit, M.A, *Stressful Life Events and Alcohol Problems among*

(Continued on following page)

may be implicated in the steady increase of the female prison population in the United States.[13]

It is also likely that the risk of post-abortion substance abuse among women who undergo multiple abortions is even higher than the risk for women who experience only a single abortion. Indeed, 45 percent of the incarcerated women surveyed by Oil of Joy experienced multiple abortions. (App. 1, ¶ 8).

3. A Substantial Percentage of Post-Abortive Women Had Parenting Problems with Children Born Subsequently

The Oil of Joy studies showed that 45.2% of the women saw a connection between their abortion and their inability to bond with their subsequent children. (App. 1, ¶ 9). Abortion is linked with increased depression, violent behavior, alcohol and drug abuse, replacement pregnancies, and reduced maternal bonding with children born subsequently.[14] These factors are closely associated with child abuse and would appear to confirm individual clinical assessments linking post-abortion trauma with

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Women Seen at a Detoxification Center, J. STUDIES ON ALCOHOL VOL. 39, NO. 9, at 1559 (1978).

[13] *Ibid; See also* U.S. Department of Justice, Bureau of Justice Statistics, Table 6.22 at http://www.albany.edu/sourcebook/pdf/1622/pdf (showing steady increase in female offender population in U.S. prisons).

[14] Reardon, David C., M.D., *The Aftereffects of Abortion* (Elliot Inst. 1990).

subsequent child abuse.[15] Of the 104 participants in the Oil of Joy study, 61 percent expressed anxiety in their parenting due to fears that something bad would happen to their present children. They felt that they had to over-protect their children, and be careful to do everything right. They were motivated by their past decision to "wait to become a mother", and felt a need to prove that they had become a perfect mother. If they felt this was not reflected in their children's behavior, the children were punished severely. (App. 1, ¶ 9).

Canadian psychiatrist Philip Ney reports the same findings. He writes,

> When I investigated the relationship between child abuse and abortion and reported a direct correlation, people were angry and astonished. It appeared that the rate of child abuse did not decrease with freely available abortions. In fact, the opposite was true. In parts of Canada where there were low rates of abortion there were low rates of child abuse. As the rates of abortion increased, so did child abuse . . . Indeed, it is a vicious cycle. That is, parents who have been involved in abortion are more likely to abuse and neglect their children. Mothers and fathers who were abused as children are more likely to abort their child.

Ney, Philip G., M.D., *Deeply Damaged* 91 (3d ed., Pioneer Publishing: Victoria, Canada 1997).

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[15] Philip G. Ney, M.D., *Relationship between Abortion and Child Abuse,* 24 CANADIAN J. OF PSYCHIATRY 610-620 (1979).

4. Having An Abortion Was Associated With Sexual Dysfunction and Chronic Marriage and Intimate Relationship Problems

Approximately 53 percent of the incarcerated post-abortive women, 66 out of 104, reported post-abortion disruptions in their personal relationships. (App. 1, ¶ 11). These problems included an aversion to sex and/or males in general, and/or the development of a promiscuous life-style. Issues of distrust and fear of pregnancy contributed to frigidity and homosexuality, while lowered self-esteem and a desire to replace the aborted baby contributed to promiscuous lifestyles. (App. 1, ¶ 10).

As demonstrated by past studies, for most couples, an abortion causes unforeseen problems in their relationship.[16] Post-abortion couples are more likely to divorce or separate. Many post-abortion women develop a greater difficulty forming lasting bonds with a male partner.[17] This difficulty may be due to abortion-related reactions such as lowered self-esteem, greater distrust of males, sexual dysfunction, substance abuse, and increased levels of depression, anxiety, and volatile anger. In 1998 the Justice Department reported that women were the perpetrators of almost one third of domestic violent crimes.[18] Freely available abortion and its injurious effects on male/female relationships may be responsible for some of these crimes.

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[16] *Psychological Sequelae*, *supra* note 4, at 4 n.21 (citing studies).

[17] *Id.*

[18] Hubin, Donald C., "Intimate Partner Violence," Dept. of Philosophy, Ohio State Univ. (1998) (Report to United States Department of Justice).

5. Many Women Associated their Abortion with Subsequent Crime and Incarceration

The number of women under the jurisdiction of State or Federal prison authorities is increasing more rapidly than that of men.[19] The rate of female incarceration has steadily inclined since legalized abortion in 1973.[20] In a separate survey done by Oil of Joy of 27 post-abortive female offenders, approximately 63 percent said that they felt that abortion had either a lot to do with their incarceration or had an indirect effect on their crime and subsequent incarceration.[21] In addition, Oil of Joy consistently finds that whenever support after abortion to segments of the prison population is offered, over half of the women respond, expressing their need for recovery after abortion. (App. 1, ¶¶ 12, 13). It is clear that abortion has had a significant adverse effect upon these women, causing dysfunctional and destructive behavior and ultimately, in many cases, leading to crime and incarceration, which this Court should consider in ruling on Norma McCorvey's petition for a writ of certiorari.

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[19] U.S. Department of Justice, Bureau of Justice Statistics reveal that the number of women under the jurisdiction of State or Federal prison authorities increased 4.9 percent during 2002, while the number of men rose just 2.4 percent. Bureau of Justice Statistics, U.S. Dept. of Justice, *Prisoners in 2002* 4 (July 2003 & March 2004).

[20] U.S. Department of Justice, Bureau of Justice Statistics, Table 6.22 at http://www.albany.edu/sourcebook/pdf/1622/pdf.

[21] Oil of Joy program exit survey, Lane Murray Unit, November 2004, 27 mothers surveyed, representing 90 abortions.

II. THE FACTUAL AND MORAL ASSUMPTIONS UNDERLYING *ROE* ARE NOT VALID

A. INVALIDITY OF FACTUAL ASSUMPTIONS

As shown by the Oil of Joy surveys and prior documented studies, induced abortion has been more harmful to women than had they made the decision not to have an abortion. The assumptions that constituted the justification for *Roe* included: 1) a "distressful life and future" by reason of maternity; 2) the alleged "distress . . . associated with the unwanted child"; and 3) being purportedly "unable, psychologically and otherwise, to care for [the child]." 410 U.S. at 153. The *Roe* Court essentially promoted abortion as therapeutic to cure or prevent those purported ills.

In later decisions, the Court, in reaffirming *Roe*, expanded the notion of the choice to abort as being justified not only for therapeutic reasons, but as a right that belongs to the woman for reasons of convenience. As Justice Blackmun laid out in his concurring opinion in *Casey*, the right of abortion must continue undisturbed because "motherhood has a dramatic impact on a woman's educational prospects, employment opportunities and self determination. . . . " 505 U.S. at 928.

These justifications are not sound, particularly in present-day society. The Pregnancy Discrimination Act of 1978,[22] 42 U.S.C. § 2000e, *et seq.*, and the Family and Medical Leave Act of 1993, 29 U.S.C. § 2601, *et seq.*, have

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[22] Discrimination is prohibited on the basis of sex, including "pregnancy, childbirth or related medical conditions." 42 U.S.C. § 2000e(k).

eliminated many of the concerns related to pregnancy and childbirth and the associated impact on economic and employment opportunities. Unwed motherhood is no longer a stigma, and in most instances, it does not prevent a woman from being physically active or from attending school. The pain associated with labor and delivery has been significantly lessened by the widespread use of the Lamaze method, anesthetic epidurals and other pain-relieving methods and medicines. Open adoption, Baby Moses laws, the prevalence of pregnancy crisis centers, continued extended family support, together with church, school and community child-bearing and parenting classes and support groups, not to mention the plethora of resources available in bookstores, libraries and on the internet, have eased the anxieties that may have previously existed for pregnant mothers.

B. INVALIDITY OF MORAL ASSUMPTIONS

An insidious effect of *Roe,* from which many post-abortive women in prison and other post-abortive women are now suffering, was that the ruling, for the first time, placed abortion and maternity on a co-equal moral plane. The same value was ascribed to aborting the child as the choice to deliver a child. This philosophy, manufactured by the Court, infiltrated the culture. As a result, many unsuspecting women bought into the concept that they must end their pregnancies for the sake of their boyfriend, their parents, their husband or their career, and it is these same women who have had to bear the enormous and crippling guilt of having murdered their own children. For some, it has been manifested through anti-social and criminal behavior, destructive not only to the women themselves, but to society as a whole.

Given the fact that pregnancy is a natural and normal experience which is increasingly supported by our culture, and due to the mounting evidence of the destructiveness to women, and ultimately to society, of abortion on demand, this Court should reconsider the social policy it engineered in *Roe*.

CONCLUSION

For all of the reasons set forth above, amicus request that the Court grant the petition for a writ of certiorari.

Respectfully submitted,

DONNA SMITH CUDE
Counsel of Record
20333 State Hwy. 249, Suite 200
Houston, Texas 77070
(281) 370-0064

FEBRUARY 2005

No. 04-967

IN THE UNITED STATES SUPREME COURT

Norma McCorvey, formerly known as Jane Roe, Petitioner

v.

Bill Hill, Dallas County District Attorney, Respondent

AFFIDAVIT OF RHONDA ARIAS IN SUPPORT OF *AMICUS CURIAE* BRIEF OF OIL OF JOY FOR MOURNING IN SUPPORT OF PETITIONER NORMA McCORVEY, FORMERLY KNOWN AS JANE ROE

STATE OF TEXAS §
§
COUNTY OF HARRIS §

Before me, the undersigned authority, on this day personally appeared Rhonda Arias, who upon oath stated as follows:

1. My name is Rhonda Arias. I am over the age of twenty-one and have never been convicted of a felony or a crime of moral turpitude. I am of sound mind and I am fully competent to make this Affidavit. I have personal knowledge of the matters contained in this Affidavit and the matters contained herein are true and correct.

2. I am a post-abortive woman and a minister in charge of a non-profit faith-based organization known as Oil

of Joy for Mourning (hereinafter referred to as "Oil of Joy"). As part of its ministry, Oil of Joy offers a rehabilitation program for post-abortive women who have been harmed by abortion.

3. In connection with this program, Oil of Joy obtained data from women in prison who had completed Oil of Joy's rehabilitation program. Specifically, Oil of Joy offered a rehabilitation program in 2004 to a general offender population in each of three prisons located in Texas, the Lane Murray Unit located at 1916 North Highway 36 Bypass, Gatesville, Texas (hereinafter "Lane Murray"), the Mt. View Unit located at 2305 Ransom Road, also in Gatesville, Texas (hereinafter "Mt. View"), and the Plane State Jail, located on Route 3 in Dayton, Texas (hereinafter "Plane State").

4. Oil of Joy conducted intake and exit surveys in conjunction with this program. The results of the study are based on surveys of 104 female offenders in Texas prisons who voluntarily completed a ten-week support group program for women hurt by abortion.

5. As shown more specifically below, the data obtained from the women who participated in the program demonstrate numerous adverse consequences of abortion, including depression, increased risk of suicide, alcohol and drug abuse, child abuse and neglect, sexual dysfunction, chronic marriage and intimate relationship problems, and an increased likelihood of turning to crime and subsequent incarceration.

6. Fully 74 percent of those surveyed at the beginning of the program said they regretted their abortion. All reported a range of psychological sequelae ranging from

regret to suicidal ideation. Despite their present state of incarceration, approximately 59 percent compartmentalize their lives as before and after their *abortion*. Their abortion was the defining moment in their lives.

7. Approximately 66 percent reported depression following their abortions. The reasons given for such depression included lowered self-esteem post abortion, repressed grief due to having to return to environments where abortion was considered normal, or having been forced or coerced strongly by a spouse or family member to have an abortion. In addition, suicidal ideation and actual suicide attempts were relatively common among these post-abortive women. Approximately 32 percent of the women in our programs reported having attempted suicide following their abortions, with another 37 percent experiencing repeated thoughts of suicide. A true and correct copy of the graph showing these results is as follows:

	Depression	%	Suicidal ideation	%	Suicide attempts	%
Plane State	31/46	67.3	10/46	21.7	10/46	21.7
Mt. View	15/16	93.7	6/16	37.5	5/16	31.2
Lane Murray	23/42	54.8	22/42	52.4	18/42	42.8
	69/104	66.3	38/104	36.5	33/104	31.7

8. Abortion is significantly linked to offenders' subsequent drug and alcohol abuse. Female offenders surveyed by Oil of Joy specifically attributed their drug or alcohol abuse to stress related to their abortion. Most reported that their abortion was either a starting point, or the point at which

she increased her usage of drugs and alcohol. Only 14 percent reported that they had no substance abuse post-abortion. The reasons given for such usage or increased usage of drugs or alcohol post-abortion were lowered self-esteem, the pain of a loss that no one seems to understand, the lack of any forum in society within which to grieve, feelings of guilt and shame, and anger toward themselves and others. Forty-five percent of the women surveyed experienced multiple abortions. A true and correct copy of the graph displaying the foregoing findings is as follows:

	Drugs	%	Alcohol	% Alcohol	% Substance abuse
Plane State	39/46	84.7	34/46	73.9	89.1
Mt. View	9/16	56.3	8/16	50.0	62.5
Lane Murray	33/42	78.6	32/42	76.2	85.7
	81/104	77.9	74/104	71.2	83.7

9. The Oil of Joy studies showed that 45.2 percent of the women saw a connection between their abortion and their inability to bond with their subsequent children. Sixty-one percent expressed anxiety in their parenting due to fears that something bad would happen to their present children. They felt they had to overprotect their children and be careful to do everything right. They were motivated by their past decision to wait to become a mother, and felt a need to prove that they had become a perfect mother. If they felt this was not reflected in their child's behavior, the child was

punished severely. A true and correct copy of the graph pertaining to the detachment from born children is as follows:

	Detachment	%
Plane State	22/46	47.8
Mt. View	5/16	31.3
Lane Murray	20/42	47.6
Totals	47/104	45.2

10. Approximately 53 percent of the incarcerated post-abortive women reported experiencing sexual dysfunction, of both short and long duration, beginning immediately after their abortions. These problems included an aversion to sex and/or males in general, and the development of a promiscuous lifestyle. Issues of distrust and fear of pregnancy contributed to frigidity and homosexuality, while lowered self-esteem and a desire to replace the aborted baby contributed to promiscuous lifestyles. A true and correct copy of the graph depicting the responses pertaining to sexual dysfunction and abortion is as follows:

	Frigidity	Promiscuity	Homosexuality	General
Plane State	9/46	14/46	10/46	18/46
Mt. View	6/16	3/16	3/16	8/16
Lane Murray	17/42	20/42	18/42	29/42
Totals	30.7%	35.6 %	29.8%	52.8%

11. In terms of disruption to personal relationships, the following chart shows the results from the prison survey:

	Disruption of personal relationships	%
Plane State	22/46	47.8
Mt. View	13/16	81.3
Lane Murray	31/42	73.8
TOTALS	66/104	63.5

12. Oil of Joy conducted a study in November 2004, consisting of an exit survey of 27 post-abortive women in the Texas Lane Murray Unit. Of these 27 mothers surveyed, approximately 63% of post-abortive female offenders said that they felt that abortion had either a lot to do with their incarceration or an indirect effect on their crime and subsequent incarcerations.

13. Oil of Joy consistently finds that whenever support after abortion to random segments of the prison population is offered, over half of the women respond, expressing their need for recovery after abortion.

14. Given the foregoing plethora of social science data concerning the adverse effects of abortion on the psychological health of women and the mounting evidence associating abortion with criminal behavior, it is clear that the availability of abortion on demand is harmful to women's health in a myriad of ways, as well as society in general.

Further Affiant saith naught.

/s/ Rhonda Arias
Rhonda Arias

SUBSCRIBED AND SWORN TO BEFORE ME by the said Rhonda Arias this 25th day of January, 2005.

/s/ Liliana E. Deagustini
Notary Public in and for
The State of Texas

My commission expires:
12-14-2005